

Guidance for Research Variances – Progress Update
NOSB Crops and Policy Development Committees
October 06, 2006

For the past year, the Crops and Policy Development Committees have been working to provide recommendations for temporary variances for the purpose of conducting research. One topic of discussion concerns research involving prohibited materials and practices, particularly such research that must be conducted on transitional or certified organic land due to funding stipulations. Because NOP rule section 205.290(e) specifically forbids temporary variances involving practices, materials or procedures prohibited under § 205.105, the committees are attempting to find ways to accommodate this type of research under the current Rule framework. The committees have been working on a document recently re-named Guidance for Certification of Operations Participating in Research (COPR). Ongoing work on the COPR document will attempt to outline the procedures to request, maintain, document, and control distinct plots used for such comparative research within the confines of the certified organic farm plan of a research operation..

Another major discussion point on temporary variances questions the validity of allowing certifiers to grant variances (acting in place of the NOP Administrator). This idea had been proposed as a way to streamline the temporary variance process. After close scrutiny of the NOP Rule, the committees determined that the Administrator must be the one to grant any variances. The committees will be discussing ways to streamline the approval process of temporary research variances as part of the work in progress on the COPR document.

This update on the work in progress on this topic seeks to inform the public and to stimulate continued input from all concerned parties.

Thank you,

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